

October 27, 2010

Nicole Miller
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NE
Washington, DC 20463

Re: American Academy of Ophthalmology Inc. Political Committee (OPHTHPAC)
FEC ID C00196246
September Monthly Report (8/1/10 - 8/31/10)

Dear Ms. Miller:

I am writing in response to your letter dated October 8, 2010, regarding the above-referenced report filed by American Academy of Ophthalmology Inc. Political Committee (the PAC).

Item number 1 on your letter concerned the possible failure to file a required 48 hour notice for an 8/10/10 independent expenditure for Nan S. Hayworth in the amount of \$4,577. Please consider the following:

We filed Form 24 on 8/11/10 (FEC-486726).

We subsequently filed Form 99 (FEC-490103) on 8/23/10 explaining that Filing FEC-486726 was done in error and was not an independent expenditure.

Therefore, as of 8/10/10 the aggregate of our independent expenditures for the 2010 General Election had not yet reached the \$10,000 threshold.

Item number 2 on your letter indicated that our independent expenditure for Nan Hayworth required a brief statement or description of the expenditure. We intend to file an amended September Monthly Report to clarify this transaction.

Item number 2 on your letter also concerned Schedule B expenditures for 'Miller Meek Poll' and 'Survey Research'. Both of those expenditures were for non-partisan polls. Neither activity contained express advocacy.

Should you have any questions, please feel free to contact me.

Sincerely,

Steven Rausch
Treasurer